

DOT Docket Office

fax: 202-493-2251

155780

FAA-01-11133-29

Page 1 of 3

From: arthurswest@yahoo.com
Sent: Friday, February 08, 2002 10:17 PM
To: govt@eaa.org
Subject: Comments to NPRM No. FAA-2001-11133, Certification of Pilots, Aircraft and Repairmen for the Operation of Light Sport Aircraft

Name: Arthur S. West
Address: 25 Northfield Drive
City: Florence
State: Kentucky
Zip: 41042

I would like the following aircraft to be eligible for the Light Sport Aircraft category:

Aircraft/kit Manufacturer: Aeronca
Type of Aircraft: Airplane
Aircraft Model: 1946 Chief 11AC
Number of Engines: 1
Type of Engine: Recip
Type of Propeller: Fixed
Number of Seats: 2
Fixed Gear: Yes
Seaplane with Repositionable Gear:
Maximum Gross Weight: 1280 lbs.
Maximum Stall Speed, Landing Configuration: 40 mph
Life-enhancement devices: No
Maximum Stall Speed, Cruise: 40 mph
Maximum Cruise Speed: 90 mph

Justification: SIRS:

I am a current valid private pilot and own a 1946 11AC Aeronca Chief with a 65 HP engine which I fly as often as I can.

I also have an AVID Mark IV with a 65 HP engine which will qualify as a sport aircraft. I also fly this aircraft.

I have a tail dragger endorsement which I got in a 1946 Aeronca Champ 7AC which will qualify as a sport class aircraft.

Therefore I have experience flying an Aeronca Chief 11AC, an Aeronca Champ 7AC and an AVID MARK IV sport class homebuilt aircraft. I have done training/safety spins in all three aircraft. All three are taildragger aircraft.

Following is why I feel the Aeronca Chief 11AC should be allowed into the Sport Class.

The Aeronca Chief 11AC is an antique aircraft manufactured by the same company that made the Aeronca Champ 7AC which will fall within the Sport Class of aircraft. The 11AC and 7AC are almost the same aircraft.

The 11AC is a simple aircraft and as easy to maintain as the 7AC.

Both 11AC and 7AC usually have no electrical system and are hand proped.

The 11AC is not really appropriate as a business aircraft but very nice as sport aircraft. They are almost exclusively used as sport aircraft.

1752 CG 3
ART WEST

The 11AC and 7AC in general share the same engine, prop, fuel system, heater, cooling system, control surfaces, fabric, tail surfaces, wing, struts, bracing, stringers, runners, spars, landing gear, tail wheel assembly, wheels, tires, axels, breaks, controls cables, instruments and most other parts.

Both carry the same number of people (2).

The Chief 11AC dive, stall, spin, max speed, cruse, bank, yaw, roll, take off, and landing characteristics are the same as the Champ 7AC.

In addition the 11AC is much easier to take off, fly and land then my AVID Mark IV sport class aircraft because it is longer and therefor slower to yaw. Also the 11AC allows much slower rudder inputs to be effective during landing and takeoff then does the AVID Mark IV.

About the only difference between the Champ 7AC and Chief 11AC is:

1. The Chief 11AC is a side by side two place while the Champ 7AC is a tandom. In my opinion the 11AC side by side aircraft is safer then the 7AC for a sport pilot class aircraft because the 11AC provides for side by side training vs tandom. Also it is harder to load the 11AC into an out of balance condition then it is the 7AC due to the location of the baggage compartment and the location of the passanger seat.
2. The 11AC Chief carries an additional 8 gal of fuel so has a slightly longer range. This makes it safer for the typical type of local airknocker flying done in both the 7AC and 11AC.
3. The 11AC Chief is a few pounds heavier then the 7AC Champ. I have flown both and the 11AC being a yoke aircraft, vs a stick in the 7AC, is slower on control inputs and would be easier to control and harder to stall by a novice pilot. In addition the slight weight difference makes no noticable difference in either 7AC or 11AC flight characteristics.

The 11AC is a very simple aircraft and as easy to maintain as the 7AC. Both can be well maintained by a properly trained owner.

Because the 7AC and 11AC are very old frabric aircraft they are both of a type and age that it is difficult to find a certified mechanic and AI who will work on them. It is even hard to find an AI who even knows how to work on them.

Both the 7AC and 11AC are old and are in the price affordability range of many people who are involved with EAA who like to work on their own aircraft as allowed by law. Because of this fact and the lack of trained AI's who do old fabric aircraft, if owners of 11AC aircraft are allowed to take training and do maintenance these old aircraft will be safer and better maintained then they are currently.

Both the 11AC and 7AC were built many years ago and are not being built today. Therefore to add the 11AC to the list will not require any complicated changes in the proposed specifications. It would only require it be added to a list by name year and model of currently existing specific aircraft allowed sport class status.

In addition because of age and the fact the 11AC is no longer made, the

economic impact on new sport class aircraft makers and dealers will be unnoticeable.

On a personal note, many people who will fly with a sport pilot liscense most likely flew 11AC Chief's in the past and will derive enormous pleasure in being allowed to fly them again.

Finally, the inclusion of the 11AC in the class of sport aircraft will go a long way to help maintain the remaining fleet of 11AC aircraft in a safe flying condition and contribute to our great flying heritage for future generations in the coming 21st century. Remember we want these 1946 11AC's flying for another 56 years so our grand children and great grand children can also enjoy them in flying condition.

Respectfully,

Art West